



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 6, 2017

Vice Admiral Thomas Moore
Navy Sea Systems Command
1333 Isaac Hull Avenue SE
Washington Navy Yard, DC 20376

Re: In-Water Hull Cleaning for the Inactive Carrier Ex-Independence (CV 62)

Dear Vice Admiral Moore:

Thank you for organizing the conference call with a representative from Governor Inslee's Office and Washington Department of Ecology (Ecology) staff on January 12, 2017, to discuss the United States Navy's in-water hull cleaning of the inactive aircraft carrier the Ex- *U.S.S. Independence*, currently stationed at the Puget Sound Naval Shipyard in Bremerton, Washington. As we conveyed during our conversation, the Washington State Department of Ecology does have concerns about the in-water hull cleaning relative to discharges of copper and other pollutants given current clean-up efforts in place for Sinclair Inlet.

The Navy's in-water hull cleaning action is being conducted within an active Superfund Site. Sinclair Inlet is a Clean Water Act 303(d) impaired water body for copper and other contaminants. The in-water hull cleaning of the Ex- *U.S.S. Independence* and related discharges were characterized on the call as being covered by the Uniform National Discharge Standards (UNDS). However, we understand the UNDS implementing regulations have not been finalized and therefore, the Navy's in-water hull cleaning could be subject to applicable state and local regulation, in addition to other federal laws. Ecology was heartened to see the letter from Environmental Protection Agency (EPA) to the Navy dated January 20, 2017, that re-affirmed EPA's commitment to the Puget Sound Naval Shipyard Complex Superfund Site and the importance for the Navy to follow additional sediment sampling and water quality monitoring requirements. Given the advanced stage of deterioration of the ship, the near completed status of the hull cleaning, and the ongoing consultation in place with EPA, Ecology recommends the Navy implement the additional water quality and sediment monitoring requirements included in EPA's letter in January 2017.

Puget Sound is a treasured water body to our state. The recent visit this past fall by the Council for Environmental Quality for the White House, concurrent with the signing of the federal Memorandum of Understanding for Puget Sound affirmed this water body's value on a national

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level. It also reinforced roles and responsibilities of the federal agencies involved or working within Puget Sound and the importance of coordination and communication across the many jurisdictions and regulatory responsibilities. Strong federal, state, and tribal partnership and coordination is key to ensuring all of our interests and work are successfully achieved in an efficient, effective, and transparent manner.

Pursuant to the additional vessels located in the Puget Sound Shipyard anticipated to undergo similar cleaning, towing, and dismantling activities, Washington Ecology requests a meeting with the Navy, EPA, and the National Marine Fisheries Service before any future in-water work occurs. This meeting would serve as a foundational discussion to inform future consultations and authorizations for in-water work to ensure the protection and recovery of Puget Sound. Please contact Heather Bartlett at (360) 407-6405 or heather.bartlett@ecy.wa.gov to set a meeting at a mutually agreeable time.

Sincerely,



Maia D. Bellon
Director

cc: Joshua Frederickson, Energy and Environmental Readiness Division (N45)
Admiral Gary Mayes, Commander, Navy Region Northwest
Captain E. Alan Schrader, Commander, Navy Base Kitsap
Peter Murchie, Environmental Protection Agency
Barry Thom, NOAA Fisheries
Leonard Forsman, Chairman Suquamish Tribe
Rob Duff, Governor's Office